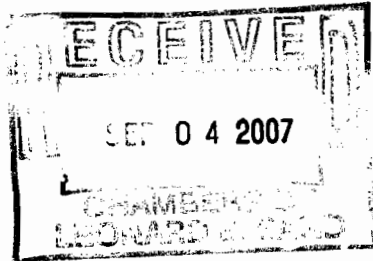




United States Attorney  
Southern District of New York

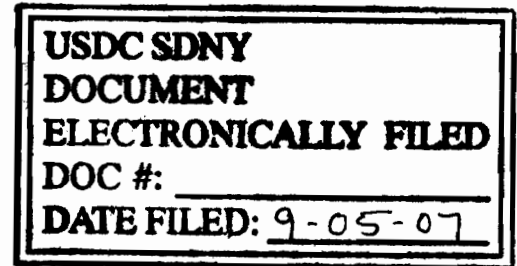


The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 30, 2007

By Hand

The Honorable Leonard B. Sand  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, 1650  
New York, New York 10007



Re: United States v. Bruno Schuschny,  
07 Cr. 372 (LBS)

Dear Judge Sand:

The next pre-trial conference in this case is scheduled for Tuesday, September 4, 2007, at 4:30 p.m. As Your Honor is aware, the defendant has been indicted in the Northern District of New York (the "N.D.N.Y.") for charges unrelated to the offense charged in the above-referenced indictment. The defendant has appeared in the N.D.N.Y., and he and his counsel in the N.D.N.Y. are still reviewing discovery related to that case. The Government has also been discussing with the defendant's counsel the possibility of a pre-trial disposition to all of the defendant's pending charges.

I have conferred with Philip L. Weinstein, Esq., counsel for defendant, and the parties jointly request that the pre-trial conference scheduled for September 4, 2007, be adjourned approximately thirty days to allow the defendant to continue to meet and confer with his N.D.N.Y. counsel to consider a possible disposition to his pending cases.

If Your Honor grants the parties' request, then the Government respectfully requests that the Court exclude time from September 4, 2007, until the date set by the Court for the next conference, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow the defendant to review discovery, and allow the parties to

**MEMO ENDORSED**

Hon. Leonard B. Sand  
August 30, 2007  
Page 2

consider a possible pre-trial disposition. Defense counsel consents to this request for the exclusion of time. A proposed order is attached.

Respectfully submitted,

MICHAEL J. GARCIA  
United States Attorney

By: *Todd Blanche*  
Todd Blanche  
Assistant U.S. Attorney  
(212) 637-2494  
(212) 637-2937 (facsimile)

cc: Philip L. Weinstein, Esq.  
Attorney for Defendant

*Endorsement*  
*Agreed to October 16, 2007 at*  
*4:30pm*

*So ordered*  
*[Signature]*  
*USA*  
*9/14/07*

**MEMO ENDORSED**